The Alliance

for Responsible Atmospheric Policy

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January 31, 2006

Eileen Wenger Tutt
Special Advisor to the Secretary
California Environmental Protection Agency
1001 I Street, P.O. Box 2815
Sacramento, CA 95812-2815

Dear Ms. Tutt:

On behalf of the Alliance for Responsible Atmospheric Policy (Alliance), an industry coalition, I am submitting comments on the strategies proposed for HFCs in the California Environmental Protection Agency's Climate Action Team Report to the Governor and Legislature.

The Alliance is an industry coalition that was organized in 1980 to address the issue of stratospheric ozone depletion. It is presently composed of about 100 manufacturers, businesses, and industry association members that rely on fluorocarbon gases, including HFCs. The represented industry sectors include air conditioning and refrigeration, foam insulation, motor vehicles, and metered dose inhalers. Today, the Alliance is a leading industry voice that coordinates industry participation in the development of reasonable international and U.S. government policies regarding ozone protection and climate change. A list of members is attached.

General Comments

The Alliance supports cost-effective actions to minimize the impact of HFCs on the climate. Among other things, the Alliance issued "Responsible Use Principles for HFCs" and obtained co-sponsorship of these principles by governments and industry associations. We have worked with the U.S. Environmental Protection Agency (EPA) and other sectors of the federal government to address climate issues, including a voluntary partnership to reduce by-product HFC-23 emissions during the manufacture of HCFC-22. In addition, we strongly encourage EPA to enforce the Clean Air Act prohibition against the intentional venting of HFCs during the service and maintenance of air conditioning and refrigeration equipment, and to penalize violators. Industry is very supportive of minimization of HFC releases to the atmosphere through stronger enforcement of this federal law.

The Alliance supports an international and national approach to addressing climate change. We oppose individual state and local approaches that make it difficult for business and industry to comply with differing requirements or prescriptive targets

www.ipcc.ch/activity/sroc/index.htm. A dramatic reduction in warming impact already occurred through the phaseout of ozone-depleting substances.

In addition, the implementation of HFCs to manufacture energy efficient foam insulation and the use of HFC refrigerant in energy efficient appliances is one of the most proven ways to reduce CO2 emissions from electricity use. This can also reduce the demand for electricity – a key issue for the State. Other less energy efficient alternatives can exacerbate climate change as well as cause concern for safety, toxicity, flammability, and effectiveness.

Because of their energy efficiency, HFCs have a positive role to play in actually reducing greenhouse gas emissions. The more energy efficient a system is, the less carbon dioxide is emitted by the generation of the power used to run the system. It is important to use HFC analysis with Life Cycle Climate Performance (LCCP) because energy performance of HFC-reliant equipment far outweighs the direct global warming impact of the HFCs. HFC systems often have a lower overall global warming impact than alternative refrigerant systems.

Industry frequently chooses HFC-based technologies due to inherent safety benefits versus alternatives. Also, HFC systems are lower in cost than most other options. In addition, the infrastructure is already in place to allow for system servicing and could readily be extended to facilitate refrigerant recovery and recycle at end of life.

Use of HFCs

Industry supports an approach toward responsible use of HFCs and reduction and containment of HFC emissions from sources. In its 2005 Special Report, the IPCC noted that reductions from business as usual emissions can be achieved through a variety of means. The report estimates that emissions could be reduced by as much as 60% from projected levels by giving serious consideration to containment and responsible use and servicing practices. The conclusions of this assessment illustrate the value of responsible use practices for HFCs that have been occurring and are encouraged by business and governments throughout the world.

In 2002, the U.S. EPA, the United Nations Environment Programme (UNEP), the Japan Ministry of Economy, Trade, and Industry (METI), and the Alliance announced a partnership on "Responsible Use Principles for HFCs." They were endorsed by over 25 industry associations worldwide. See www.arap.org.

The principles include: Select HFCs for applications where they provide health and safety, environmental, technical, economic, or unique societal benefits; Minimize HFC emissions to the lowest practical level during chemical manufacture and during use and disposal of equipment using cost-effective technology; Engineer, operate and maintain HFC-using systems to minimize emissions and maximize energy efficiency; and Recover, recycle, reclaim and/or destroy used HFCs where technically and economically feasible. Sectors have expanded the principles and are presently issuing specific

MEMBERSHIP LIST

Air Conditioning Contractors of America
Air Conditioning & Refrigeration Institute
Alliance for the Polyurethanes Industry
American Pacific Corp.
American Plastics Council
Arkema
Association of Home Appliance Manufacturers
Bard Manufacturing Co.
Brooks Automation
Cap & Seal Company
Carrier Corporation
Copeland Corporation
Dow Chemical U.S.A.
Dupont
Dupont/Dow
E.V. Dunbar Co.
Falcon Safety Products
FP International
General Electric
General Motors
Gilman Corporation
H. C. Duke & Son
Halotron
Honeywell
Hudson Technologies
Hussmann Corporation
Ineos
Ingersoll-Rand/Thermo King
Institute of International Container Lessors
International Pharmaceutical Aerosol Consortium
Lennox International
Luce, Schwab & Kase
Maytag Corporation
McQuay International
Metl-Span Corporation
National Refrigerants
Owens Corning Specialty & Foam Products Center
Refrigeration Service Engineers Society
Refron
RemTec International
Ritchie Engineering
Siemens Building Technology
Solvay
Sporlan Valve Co.
Spray Foam Alliance
Sub-Zero
Tech Spray
ThermoQuest-Forma Scientific Division
Trane Company
Tyler Refrigeration
Unitor Ships Service
Whirlpool Corporation
Worthington Cylinder
York International
Zero Zone